UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

COMMONWEALTH OF PUERTO RICO, et al., Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS (Jointly Administered)

MOTION OF THE GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO AND THE PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR LEAVE TO SUBMIT SPANISH LANGUAGE EXHIBITS AND FOR EXTENSION OF TIME TO FILE CERTIFIED TRANSLATIONS

TO THE HONORABLE COURT:

The Government Development Bank for Puerto Rico (the "<u>GDB</u>") and the Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>"), through the undersigned attorneys, respectfully state as follows:

1. Today, AAFAF and the GDB filed their Objection of the Government Development Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the Official Committee of Unsecured Creditors' Derivative Standing Motion [ECF No. 3881] (the "Objection") with a supporting Declaration of Matthew P. Kremer, Esq. in Support of the Objection of the Government Development Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the Official Committee of Unsecured Creditors' Derivative Standing Motion [ECF No. 3881] (the "Declaration") [ECF No. 3961].

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) The Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566) (Last Four Digits of Federal Tax ID: 9686).

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2. In support of the arguments included in the Objection, AAFAF and GDB included

as exhibits A, B C and D to the Declaration various joint resolutions from the Puerto Rico

Legislative Assembly (the "Joint Resolutions"). Nevertheless, due to time constrains, AAFAF and

GDB were unable to translate the Joint Resolutions from their original Spanish language.

Accordingly, AAFAF and GDB seek leave from this Court to submit the Joint Resolutions and

request an extension until Tuesday, September 25, 2018, at 11:59 p.m. (AST) to file certified

English translations of the Joint Resolutions pursuant to Local District Court Rule 5(g).

3. AAFAF and GDB have diligently tried to obtain certified translations of these

documents. Nevertheless, they have not had sufficient time to obtain the same. AAFAF and GDB

are in the process of doing so on an expedited basis.

4. Accordingly, AAFAF and GDB respectfully request that the Court enter an order

substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") granting AAFAF

and GDB until September 25, 2018, at 11:59 p.m. (AST) to submit the certified translations of the

Joint Resolutions.

WHEREFORE, AAFAF and GDB respectfully request this Honorable Court enter the

Proposed Order attached as **Exhibit A** hereto and grant such other relief as is just and proper.

Dated: September 21, 2018

San Juan, Puerto Rico

Respectfully submitted,

/s/ Luis C. Marini-Biaggi

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Exhibit A

Proposed Order